

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO:</b>  <i>Rebecca Doane v. Ethicon, Inc., et al.</i> Case No.: 2:12-cv-00352	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**NOTICE OF DEPOSITION**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that the undersigned attorneys for Defendants Ethicon, Inc. and Johnson & Johnson, pursuant to FED. R. CIV. P. 30 and the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, will take the deposition upon oral examination of the following person on the date, at the time and at the place set forth below:

<u>Deponent</u>	<u>Location</u>	<u>Date</u>	<u>Time</u>
Rebecca Doane	Executive Suites 9111 Cross Park Drive Suite 200, Bldg D. Knoxville, TN 37923	12/20/16	10:00 a.m. (EST)

**PLEASE TAKE FURTHER NOTICE** that said deposition shall take place before a duly qualified Notary Public authorized to administer oaths and shall continue from day to day until completed. Said deposition shall cover all matters relevant to the subject matter of the within action.

**PLEASE TAKE FURTHER NOTICE** that the person to be examined is required to produce any document reviewed by the deponent, prior to the commencement of the deposition, to prepare for the deposition and/or to refresh the deponent's recollection regarding the facts of this case, as well as all documents requested on Schedule A.

Dated: December 1, 2016.

Respectfully submitted,

/s/ James C. Barton, Jr. \_\_\_\_\_  
James C. Barton, Jr.

COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND  
JOHNSON & JOHNSON

**OF COUNSEL**  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

Done this the 1st day of December, 2016.

/s/ James C. Barton, Jr. \_\_\_\_\_  
James C. Barton, Jr.

**SCHEDULE A**

The deponent shall bring to the deposition the following documents that are in his/her possession, control or custody:

1. Documents you reviewed to prepare and complete the Plaintiff's Profile Form.
2. Documents you reviewed to prepare and complete the Plaintiff's Fact Sheet.
3. To the extent not previously produced, all documents identified in Section VII of the Plaintiff Fact Sheet.
4. To the extent not previously produced, all documents identified in Section VIII of the Plaintiff Fact Sheet.
5. To the extent not previously produced, all documents in your possession, control or custody concerning the Pelvic Mesh Product at issue for the treatment of stress urinary incontinence and/or pelvic organ prolapse.
6. All documents that you have reviewed prior to your deposition concerning the Pelvic Mesh Product at issue for the treatment of stress urinary incontinence and/or pelvic organ prolapse, including, without limitation, patient brochures, IFUs, DVDs and FDA Health Notifications.